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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael E. Farbiarz
	:	
v.	:	Civil Action No. 24-5863
	:	
THE CONTENTS OF THE	:	<u>DECLARATION OF PUBLICATION</u>
FOLLOWING ACCOUNTS:	:	
	:	
JP MORGAN CHASE ACCOUNT	:	
ENDING IN 9483 IN THE NAME OF	:	
JAE CHOI ATTORNEY TRUST	:	
ACCOUNT, et al.	:	

Defendants *in rem*.

I, PETER A. LASERNA, pursuant to Title 28, United States Code, Section 1746, hereby declare under the penalty of perjury:

That I am an Assistant United States Attorney in the Office of the United States Attorney for the District of New Jersey, and

That attached to this Declaration are the following:

(1) A true and correct copy of the Notice of Forfeiture Action against the Defendants *in rem* (Attachment 1), and

(2) An Advertisement Certification Report generated by the Consolidated Asset Tracking System maintained by the Department of Justice, which indicates that the aforementioned Notice was posted on an official

government internet site (www.forfeiture.gov) for at least thirty (30) consecutive days, beginning on May 25, 2024, and ending on June 23, 2024, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (Attachment 2).

Dated: July 23, 2024
Newark, New Jersey

s/Peter A. Laserna
PETER A. LASERNA
Assistant United States Attorney

ATTACHMENT 1

Attachment 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
COURT CASE NUMBER: 24-CV-5863; NOTICE OF FORFEITURE ACTION**

Pursuant to 18 U.S.C. § 981, the United States filed a verified Complaint for Forfeiture against the following property:

The contents of an account at Bank of America ending in 6043 (\$530,014.20) in the name of Hee Ah Nam (20-IRS-000300), which was seized from Hee Ah Nam on September 3, 2020

The contents of an account at Bank of America ending in 6030 (\$16,980.18) in the name of Hee Ah Nam (20-IRS-000301), which was seized from Hee Ah Nam on September 3, 2020

The contents of an account at Bank of America ending in 4685 (\$32.06) in the name of Smart Learning, Inc. (20-IRS-000302), which was seized from Smart Learning Inc. DBA Homeschool Buyers on September 3, 2020

The contents of an account at JP Morgan Chase ending in 9483 (\$1,369,748.16) in the name of Jae Choi Attorney Trust Account (20-IRS-000303), which was seized from Jae Choi on September 3, 2020

The contents of an account at JP Morgan Chase ending in 4827 (\$300,036.39) in the name of Virtua Education, Inc. (20-IRS-000304), which was seized from Virtua Education, Inc. on September 3, 2020

The contents of an account at JP Morgan Chase ending in 0353 (\$157,917.19) in the name of Virtua Education, Inc. (20-IRS-000305), which was seized from Virtua Education, Inc. on September 3, 2020

The contents of an account at JP Morgan Chase ending in 0711 (\$201,870.82) in the name of Hee Ah Nam (20-IRS-000306), which was seized from Hee Ah Nam on September 3, 2020

The contents of an account at JP Morgan Chase ending in 9900 (\$6,491.84) in the name of Hudson Asset Holding Corp (20-IRS-000307), which was seized from Hudson Asset Holding Corp. on September 3, 2020

The contents of an account at JP Morgan Chase ending in 4413 (\$980,052.09) in the name of Hudson Asset Holding Corp (20-IRS-000308), which was seized from Hudson Asset Holding Corp. on September 3, 2020

The contents of an account at TD Ameritrade ending in 2857 in the name of Hee Ah Nam (20-IRS-000309)

The contents of an account at TD Bank ending in 2483 (\$662.44) in the name of Hee Ah Nam (20-IRS-000310), which was seized from Hee Ah Nam on September 3, 2020

The contents of an account at TD Bank ending in 1237 (\$210,517.24) in the name of Hee Ah Nam (20-IRS-000311), which was seized from Hee Ah Nam on September 3, 2020

The Real property located at 125 13th Street, Cresskill, New Jersey (24-IRS-000296)

Any person claiming a legal interest in the Defendant Property must file a verified Claim with the court within 60 days from the first day of publication (May 25, 2024) of this Notice on this official government internet web site and an Answer to the complaint or motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days thereafter. 18 U.S.C. § 983(h)(1) permits a court to impose a civil fine on anyone asserting an interest in property which the court determines was frivolous.

The verified Claim and Answer must be filed with the Clerk of the Court, Martin Luther King Federal Building & U.S. Courthouse, 50 Walnut Street, Room 4105, Newark, NJ 07101-0419, and copies of each served upon Assistant United States Attorney Peter Laserna, 970 Broad Street,, Suite 700, Newark, NJ 07102, or default and forfeiture will be ordered. See, 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 PM EST 30 days after the date of final publication of this notice. See 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant United States Attorney Peter Laserna, 970 Broad Street,, Suite 700, Newark, NJ 07102. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

ATTACHMENT 2



Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between May 25, 2024 and June 23, 2024. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. Contents of Account at Bank of America Ending 6043

Court Case No: 24-CV-5863
For Asset ID(s): See Attached Advertisement Copy

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	05/25/2024	23.9	Verified
2	05/26/2024	24.0	Verified
3	05/27/2024	24.0	Verified
4	05/28/2024	23.9	Verified
5	05/29/2024	24.0	Verified
6	05/30/2024	23.9	Verified
7	05/31/2024	24.0	Verified
8	06/01/2024	24.0	Verified
9	06/02/2024	23.9	Verified
10	06/03/2024	23.9	Verified
11	06/04/2024	24.0	Verified
12	06/05/2024	24.0	Verified
13	06/06/2024	23.9	Verified
14	06/07/2024	24.0	Verified
15	06/08/2024	23.9	Verified
16	06/09/2024	23.9	Verified
17	06/10/2024	23.9	Verified
18	06/11/2024	23.8	Verified
19	06/12/2024	24.0	Verified
20	06/13/2024	23.9	Verified
21	06/14/2024	23.9	Verified
22	06/15/2024	23.9	Verified
23	06/16/2024	23.9	Verified
24	06/17/2024	23.9	Verified
25	06/18/2024	23.9	Verified
26	06/19/2024	23.9	Verified
27	06/20/2024	23.9	Verified
28	06/21/2024	23.9	Verified
29	06/22/2024	23.9	Verified
30	06/23/2024	23.9	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.